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**UNITED STATES DISTRICT COURT  
DISTRICT OF GUAM**

-----X

|  |   |                         |
|--|---|-------------------------|
| Arnold Davis, on behalf of himself and all others<br>similarly situated, | : |                         |
| Plaintiff,   | : | Civil Case No: 11-00035 |
| v.   | : |                         |
| Guam, Guam Election Commission, et al.                                   | : |                         |
| Defendants.  | : |                         |

-----X

**PLAINTIFF'S OBJECTION TO DEFENDANTS' CONCISE STATEMENTS OF  
MATERIAL FACTS IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT**

Pursuant to CVLR 56, Plaintiff objects to Defendants' statement of material facts in support

of its Motion for Summary Judgment, as follows:

| DEFENDANTS' FACT  | OBJECTION   |
|---|---|
| 10. The purpose of the plebiscite is to ascertain "the desires of "those peoples who were given citizenship in 1950[.]" | The statute may so state. Even if this were a purpose of the statute, it is not the only purpose, and other purposes exist. Moreover, the statute itself also operates to seek the desires of persons who were not given citizenship in 1950. |

Respectfully submitted,

/s/J. Christian Adams

J. Christian Adams  
Counsel for Plaintiff

Date: November 20, 2015

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## **CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the forgoing Objections to Defendants' Concise Statement of Material Facts on counsel for the Defendants by filing the same through the Electronic Case Filing System on November 20, 2015, which provides an electronic copy of the same.

/s/J. Christian Adams

J. Christian Adams  
Counsel for Plaintiff